

November 14, 2011

**VIA FEDERAL EXPRESS**

Mr. Christopher J. Kanakis  
New Jersey Department of Environmental Protection  
P.O. Box 028  
401 East State Street, 6<sup>th</sup> Floor  
Trenton, New Jersey 08625-0028

**Re: Quarterly Progress Report – Third Quarter 2011  
Standard Chlorine Chemical Company (SCCC) Site  
Kearny, Hudson County, New Jersey  
October 20, 1989 Administrative Consent Order**

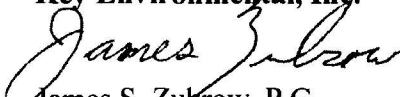
Dear Mr. Kanakis:

In accordance with Paragraph 49 of the Administrative Consent Order for the Standard Chlorine Chemical Company, Inc. (SCCC) Site located in Kearny, New Jersey and the Interim Response Action Workplan for the SCCC Site and Diamond Shamrock (Diamond) Site, please find enclosed three copies of the Third Quarter 2011 Progress Report.

If you have any questions regarding this report, please contact me at (412) 279-3363.

Sincerely,

**Key Environmental, Inc.**



James S. Zubrow, P.G.  
Principal Hydrogeologist

cc: M. W. Kelly  
E. Castro  
M. Brouman  
G. Coscia  
A. Hess  
K. Staiger  
M. Martello

**QUARTERLY PROGRESS REPORT – THIRD QUARTER 2011  
STANDARD CHLORINE CHEMICAL COMPANY, INC. SITE  
KEARNY, NEW JERSEY  
ADMINISTRATIVE CONSENT ORDER EXECUTED ON OCTOBER 20, 1989**

**Activities Initiated or Continued During the Reporting Period**

Interim Response Action Workplan (IRAW) construction activities that were initiated included:

- Septic tank abandonment by removing tank contents (for offsite disposal) and pumping each with controlled density cement to fill the tanks and piping;
- Installation of a portion of the groundwater recovery well vaults;
- Pressure testing of valve assemblies at the well vaults, and repair of the leaking valve assemblies as needed; and,
- Stormwater management Channel C-4C and C-4B installation.

IRAW construction activities that were continued included:

- Delivery and installation of Hydraulic Control Treatment System (HCTS) components;
- Capillary break system installation; and,
- Operation and maintenance of the temporary construction treatment system (TCTS) and discharge of treated water.

Non-IRAW construction activities that were continued included:

- Procurement activities for Track 2 building demolition.

**Activities Completed During the Reporting Period**

IRAW construction activities that were completed included:

- Excavation of solidified South Ditch sediments and placement in the SCCC Site consolidation area (CA), and placement of geotextile and pipe bedding/backfill;
- Placement of stormwater piping and catch basins in the excavated South Ditch;
- Trench excavations and installation of groundwater conveyance piping, electrical pull boxes, and conduit;
- Solidification of the bentonite slurry pond contents by mixing cement, and placement of contents in the CAs;
- Construction of outlet works;
- Near shore river sediment excavation from the Hackensack River and placement of sediments in the CAs;
- Excavation of additional impacted soil from the former transformer pad area; and,
- Repaired/replaced discrete sections of the slurry wall.

**QUARTERLY PROGRESS REPORT – THIRD QUARTER 2011  
STANDARD CHLORINE CHEMICAL COMPANY, INC. SITE  
KEARNY, NEW JERSEY  
ADMINISTRATIVE CONSENT ORDER EXECUTED ON OCTOBER 20, 1989**

IRAW correspondence/reporting activities that were completed are described below.

A letter titled Stormwater and General Site Maintenance Information was submitted to the NJDEP on July 18, 2011.

Periodic Fill/Stockpile Operation Reports were submitted to the New Jersey Meadowlands Commission on August 2, 2011 and August 15, 2011.

A letter Request for Modification to Waterfront Development Permit/Flood Hazard Permit/Water Quality Certificate was issued to the New Jersey Department of Environmental Protection (NJDEP) Office of Dredging and Sediment Technology on August 26, 2011 pertaining to the addition of a proposed liner system for the Diamond Site CA stormwater management channel.

A construction and Interim Remedial Action Report (IRAR) Schedule extension request was submitted to the NJDEP in a letter dated September 22, 2011.

TCTS Discharge Monitoring Reports were submitted to the NJDEP.

Bi-Weekly IRAW Construction Progress Reports were sent to the NJDEP.

Non-IRAW correspondence/reporting activities that were completed are described below.

The Track 3 Demolition Remedial Action Work Plan was approved as defined in a letter dated July 29, 2011.

**Activities to be Initiated or Continued in the Upcoming Reporting Period (Fourth Quarter 2011)**

The in-progress IRAW construction activities (described above) will continue during the fourth quarter.

- IRAW construction activities anticipated to be initiated include Startup of the HCTS.

Non-IRAW construction activities anticipated to be initiated include:

- Track 2 demolition activities.

**QUARTERLY PROGRESS REPORT – THIRD QUARTER 2011  
STANDARD CHLORINE CHEMICAL COMPANY, INC. SITE  
KEARNY, NEW JERSEY  
ADMINISTRATIVE CONSENT ORDER EXECUTED ON OCTOBER 20, 1989**

**Activities to be Completed in the Upcoming Reporting Period (Fourth Quarter 2011)**

IRAW construction activities anticipated to be completed during the fourth quarter include:

- Capillary break system installation;
- Final cover system placement in the CAs;
- HCTS construction including utilities installation;
- In-place closure of septic tanks including confirmation sampling and analysis;
- Stormwater management system construction;
- Placement of well vaults, well pumps and associated appurtenances;
- Installation of final cover in the SCCC Site and Diamond Site CAs;
- Soil borings associated with the closure of the septic tanks;
- Piezometers adjacent to the slurry wall;
- Closure/backfilling of the former transformer pad area;
- Site restoration; and,
- Contractor and equipment demobilization following construction.

Non-IRAW construction activities anticipated to be completed during the fourth quarter include:

- Installation of cathodic protection wells for the steel sheet pile wall.

IRAW reporting activities anticipated to be completed during the fourth quarter are described below.

Submission of the IRAR.

TCTS Discharge Monitoring Reports.

Bi-Weekly IRAW Construction Progress Reports.